

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-10956-REK

ERNEST OGLETREE,

Plaintiff

v.

CITY OF ATTLEBORO, STURDY MEMORIAL
HOSPITAL, INC., JAMES G. MACDONALD,
DOUGLAS JOHNSON, MICHAEL
BARTUCCA, ROBERT ASTIN, and LEWIS
RHEAUME,

Defendants

DEFENDANT JAMES G.
MACDONALD'S FIRST SET OF
INTERROGATORIES TO
PLAINTIFF ERNEST OGLETREE

Pursuant to Fed.R.Civ.P.26 and 33, the defendant hereby propounds the following interrogatories to the plaintiff, to be answered under oath within 30 days of service. The answers must be based on all information available to the plaintiff, his attorneys, agents and representatives, and on all records in the possession, custody and control of such persons.

The plaintiff is respectfully reminded that Fed.R.Civ.P.26(e) requires him to file supplemental answers promptly upon receipt of information rendering any answers previously filed inaccurate or incomplete, and in certain additional circumstances.

INTERROGATORY NO. 1

Please state your full name, date of birth, residential and business addresses, social security number, marital status, and the name(s) and date(s) of birth of your child(ren), if any.

INTERROGATORY NO. 2

Please provide a complete and detailed recitation of your educational history, commencing with high school, indicating all degrees or certificates conferred, and dates of same.

INTERROGATORY NO. 3

Please provide a complete and detailed recitation of your work history, commencing subsequent to your graduation from high school, providing in your response:

- a. the identities and addresses of all employers;

- b. the inclusive dates of your employment with each such employer;
- c. the identity of your immediate supervisor at each place of employment;
- d. your gross compensation at each place of employment;
- e. your reason for leaving such place of employment.

INTERROGATORY NO. 4

Please state any injury or illness, whether emotional, mental or physical from which you suffered in the five (5) year period prior to the occurrences set forth in the Complaint.

INTERROGATORY NO. 5

Please provide the name and address of each person (other than your attorneys) known by you to have witnessed or to have knowledge concerning the occurrences and allegations set forth in the Complaint.

INTERROGATORY NO. 6

Please state:

- a. the name and address of each person whom you or your attorney expect to call as an expert witness at the trial of this action;
- b. the subject matter on which each expert is expected to testify;
- c. the substance of the facts and opinions to which each expert is expected to testify; and
- d. the grounds for each such opinion of each expert witness. (The plaintiff is further respectfully referred to Fed.R.Civ.P.26(a)(2)(B) with respect to further disclosure of expert information).

INTERROGATORY NO. 7

Please describe in full and complete detail the incident or occurrence giving rise to the Complaint, including in your response the date, time and place of the incident or occurrence.

INTERROGATORY NO. 8

Please give an account, itemized as fully and completely as possible, of all losses which you or your legal representatives are claiming you incurred as a result of the occurrences set forth in the

Complaint, including but not limited to those losses which are attributable to hospital, medical or mental health care and treatment and loss of earnings.

INTERROGATORY NO. 9

Please set forth in full and complete detail the nature and extent of all injuries, both physical, emotional or mental in nature, allegedly suffered by you as the result of the occurrences set forth in the Complaint, including in your response:

- a. the name and address of each hospital, medical professional and mental health professional which rendered treatment to you, providing a complete description of the treatment you received, and the inclusive dates thereof;
- b. the dates between which you were absent from your employment and/or school as a result of the occurrences set forth in the Complaint.

INTERROGATORY NO. 10

If any statement has been taken from any defendant, their agents, servants or employees, whether written or oral, or received from any person including yourself regarding in any way the occurrences set forth in the Complaint, please state:

- a. the name and address of the person from whom each such statement was obtained;
- b. the date of any such statement;
- c. the substance of any such statement;
- d. the name and address of the person, firm or corporation presently in possession or custody of such statement.

INTERROGATORY NO. 11

Please identify by name, residential address, work address and telephone number your "brother-in-law", as referenced in Paragraph 11 of the Complaint.

INTERROGATORY NO. 12

Please set forth in full and complete detail the factual basis for your allegation that "[d]efendant MacDonald did not investigate the circumstances which led him to be at the defendant Hospital . . .", as set forth in Paragraph 26 of the Complaint.

INTERROGATORY NO. 13

Please set forth in full and complete detail the conversation between yourself and the "booking sergeant" referenced in Paragraph 41 of the Complaint, including in your response the identities of the booking sergeant and any witnesses to the conversation.

INTERROGATORY NO. 14

Please set forth in full and complete detail the factual basis for the allegations set forth in Paragraph 68 of the Complaint.

INTERROGATORY NO. 15

Please set forth in full and complete detail all statements or actions of defendants which you contend comprise "... threats, intimidation and/or coercion . . .", as set forth in Paragraph 71 of the Complaint.

INTERROGATORY NO. 16

Please set forth in full and complete detail the factual basis for the allegations set forth in Paragraph 74 of the Complaint.

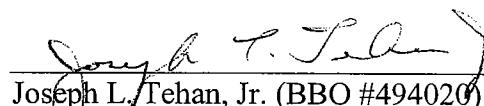
INTERROGATORY NO. 17

Please set forth in full and complete detail the factual basis for the allegations set forth in Paragraph 82 of the Complaint.

INTERROGATORY NO. 18

Please set forth in full and complete detail the factual basis for the allegations as set forth in Paragraph 85 of the Complaint.

DEFENDANT JAMES G. MACDONALD,
By his attorney,


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